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9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
12

13 **ARNOLD ABRERA,**

14 Plaintiff,

15 v.

16 **GAVIN NEWSOM, in his official capacity**
17 **as Governor of the State of California; et al.**

18 Defendants.
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Case No.: 2:22-cv-01162-JAM-DB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS NEWSOM AND BONTA
TO RESPOND TO FIRST AMENDED
COMPLAINT**

**[Fed. R. Civ. P., Rule 6(b);
E.D. Cal. Civil Local Rules 143, 144(b)]**

Judge: Honorable John A. Mendez
Trial Date: None Set
Action Filed: July 5, 2022

21 **STIPULATION**

22 Per Rule 6(b) of the Federal Rules of Civil Procedure and Civil Local Rules 143 and
23 144(b), Defendants Governor Gavin Newsom and Attorney General Rob Bonta (the State
24 Defendants), and Plaintiff Arnold Abrera, stipulate to extend the State Defendants' deadline to
25 file a responsive pleading to Plaintiff's First Amended Complaint (ECF No. 16) to November 16,
26 2023.
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1 The requested extension is 28 days after the State Defendants' present responsive pleading
2 deadline, and therefore is permitted under Rule 6(b) of the Federal Rules of Civil Procedure and
3 Civil Local Rules 143 and 144(b). Plaintiff's counsel consents to this extension of time.

4 This is the second extension of time sought with respect to any of the State Defendants'
5 responses to a pleading in this matter, and the extension will not affect the date of any event or
6 other deadline already fixed by the Court.

7 The parties further stipulate that this extension is neither intended nor will be construed as a
8 waiver of any objection or defense that the State Defendants may have or could assert against the
9 First Amended Complaint.

10 **IT IS SO STIPULATED.**

11 Dated: October 16, 2023

Respectfully submitted,

12 ROB BONTA
13 Attorney General of California
14 ANYA M. BINSACCA
Supervising Deputy Attorney General

15 /s/ Jay C. Russell
16 JAY C. RUSSELL
17 Deputy Attorney General
18 *Attorneys for Defendants Gavin Newsom, in*
his official capacity as Governor of
California, and Rob Bonta, in his official
capacity as Attorney General of California

19 Dated: October 16, 2023

Respectfully submitted,

20 VETERANS LAW CENTER
21 STRATEGIC LAW COMMAND

22 /s/ Gary W. Gorski
23 GARY W. GORSKI, ESQ.
24 DANIEL M. KARALASH, ESQ.
Attorneys for Plaintiff Arnold Abrera

[PROPOSED] ORDER

Under the above Stipulation, the time for Defendants Newsom and Bonta to respond to the First Amended Complaint is extended to November 16, 2023.

IT IS SO ORDERED.

Hon. John A. Mendez
United States District Court Judge

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CERTIFICATE OF SERVICE

Case Name: *Abrera, Arnold v. Gavin
Newsom, et al.*

Case No. 2:22-cv-01162-JAM-DB

I hereby certify that on October 16, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANTS
NEWSOM AND BONTA TO RESPOND TO FIRST AMENDED COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on October 16, 2023, at San Francisco, California.

M. Mendiola
Declarant

M. Mendiola
Signature